

Anas Saleh, Esq.

ATTORNEY AT LAW

404 Oak St., Ste. 288
Syracuse, NY 13203-2997
315-569-1343
asaleh@salehesq.com

February 13, 2019

VIA ECF

Honorable Andrew T. Baxter
U.S. Magistrate Judge
Federal Building and U.S. Courthouse P.O. Box 7396
Syracuse, New York 13261-7396

Re: USA vs. Fair. (5:18-cv-00427-FJS-1)

Dear Honorable Judge Baxter:

Good afternoon. I am honored to appear before this Court, as well as on the opposing side of the Government and AUSA Nicolas Commandeur. Your Honor, we would respectfully request a court conference in this matter.

We have been in discussion with the Government regarding my client's Sixth Amendment right to a speedy trial. Specifically, as a courtesy, I requested to know if the Government was ready for trial in accordance with my client's Sixth Amendment right.

From those discussions, my understanding is the Government is not ready. Based on my understanding of the Government's position, they provide that my client does not have that right, and he must remain detained without the right to a speedy trial. When I asked for clarification, I received none of substance. The official response was filing a stipulation with the Court (Dkt. 72), against our protest. I will of course give the Government an opportunity to clarify their position, if needed.

Based on the Government's actions and representations, we are now prepared to present legal arguments requesting that all charges against my client be dismissed for constitutional violations, including without limitation the Sixth Amendment and the Speedy Trial Act.

Respectfully submitted,

s/ Anas Saleh, Esq.

Anas Saleh, Esq. (Bar No. 517409)
Attorney for Defendant Daitwaun Fair
Anas Saleh, Esq.
Office and Post Office Address
404 Oak St., STE 288
Syracuse, NY 13203
Telephone: (315) 569-1343
Facsimile: (315) 282-2601
Email: asaleh@salehesq.com

cc via ECF: AUSA Nicolas Commandeur